UNIT	ED STATES DISTRICT COURT for the	FILED TOTAL OFFIDE
DIST	TRICT OF MASSACHUSETTS	•
		2004 JUL 15 P 12: 18
VALDEMARAS CEINORIUS,	)	
VITALIJ CHRISONOPULO,	)	HIS DISTRICT COURT
FIODOR IGNATOV,	)	U.S. DISTRICT COURT DISTRICT OF MASS
VIKTOR KUZNECOV,	)	
ANATOLIJ MATVEJEV,	)	
NIKOLAJ NIKULIN,	)	
VALERIJ POTAPOV, and	)	
VLADIMIR ULJANOV,	)	
Plaintiffs	)	
	) Civil Action	
V.	)	
	) No. 03-CV-1227	0-RWZ
ARTHUR FRANCO and	)	
JOHN G. HADAYIA,	)	
Defendants	)	
	j	

## MOTION FOR DEFAULT JUDGMENT

NOW COME the Plaintiffs, and move for default judgment against the Defendants for the reasons set forth in the attached memorandum of law.

WHEREFORE, the Plaintiffs respectfully request the following relief:

A. That default judgments be entered in favor of the Plaintiffs in the following amounts:

Ceinorius	\$3,817.42, plus treble damages, for a total of \$15,269.68.
Chrisonopulo	\$5,920.00, plus treble damages, for a total of \$23,680.00.
Ignatov	\$3,772.42, plus treble damages, for a total of \$15,089.68.
Kuznecov	\$13,399.00, plus treble damages, for a total of \$53,596.00.
Matvejev	\$4,035.00, plus treble damages, for a total of \$16,140.00.
Nikulin	\$9,049.17, plus treble damages, for a total of \$36,196.68.
Potapov	\$12,264.00, plus treble damages, for a total of \$49,056.00.

Uljanov \$4,212.00, plus treble damages, for a total of \$16,848.00.

- B. That they be awarded attorneys fees and costs in the amount of \$4,861.03.
- C. For such other and further relief as may be just.

Respectfully submitted for the Plaintiffs, by their attorney,

David J. Berg, Esq. Latti & Anderson LLP 30-31 Union Wharf Boston, MA 02109

617-523-1000